

**From:** sebyp@gtlaw.com  
**To:** [Quinones, Edwin](#)  
**Subject:** RE: POTW Position Paper- USOR Site  
**Date:** Wednesday, December 13, 2017 2:56:14 PM

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Thanks Ed and you have indeed mentioned the idea of a site visit to the Old Vince property. What has been unclear is why and for what purpose ?

Asking about that was one of the objectives for my asking for the call with you yesterday, while you and EPA/DOJ colleagues separately continue to evaluate the POTW position paper.

On your email below- what does this mean – “Secondly, it will allow them to pre-plan and better envision the concept of the proposed approach from a technical standpoint, discuss technical issues, and formulate questions and provide answers, if possible, concerning the proposed approach.”

So the City can understand why and for what purpose EPA is convening the site visit – please let me know .

Paul

**Paul M. Seby**

Shareholder

Greenberg Traurig, LLP | 1200 17th Street, Suite 2400 | Denver, Colorado 80202  
Tel 303.572.6584

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**From:** Quinones, Edwin [mailto:[quinones.edwin@epa.gov](mailto:quinones.edwin@epa.gov)]

**Sent:** Wednesday, December 13, 2017 6:50 AM

**To:** Seby, Paul (Shld-DEN-Env)

**Cc:** [mdigiglia@glllaw.com](mailto:mdigiglia@glllaw.com); [bdoherty@glllaw.com](mailto:bdoherty@glllaw.com); [egieger@glllaw.com](mailto:egieger@glllaw.com)

**Subject:** RE: POTW Position Paper- USOR Site

Hi Paul,

My apologies as I thought I had mentioned a few weeks back EPA's and the PRP Group's intent to do a site walk during the week of December 18. As I mentioned earlier, it is now scheduled for Wednesday, December 20, at 10 am. I completely understand if a technical representative from your client cannot attend due to any holiday vacation time.

The purpose of the site walk is two-fold. Firstly, it will allow the technical representatives to get a first-hand overview of current conditions of the site as a whole. Secondly, it will allow them to pre-plan and better envision the concept of the proposed approach from a technical standpoint, discuss technical issues, and formulate questions and provide answers, if possible, concerning the proposed approach.

Ed Q.

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**From:** [sebyp@gtlaw.com](mailto:sebyp@gtlaw.com) [mailto:[sebyp@gtlaw.com](mailto:sebyp@gtlaw.com)]

**Sent:** Tuesday, December 12, 2017 8:32 PM

**To:** Quinones, Edwin <[quinones.edwin@epa.gov](mailto:quinones.edwin@epa.gov)>

**Cc:** [mdigiglia@glllaw.com](mailto:mdigiglia@glllaw.com); [bdoherty@glllaw.com](mailto:bdoherty@glllaw.com); [egieger@glllaw.com](mailto:egieger@glllaw.com)

**Subject:** Re: POTW Position Paper- USOR Site

Thanks Ed and understand you all held the call earlier than arranged.

I have been asked to please have you / EPA elaborate on the purpose of the site visit you've described . What is it for and how does EPA believe it may relate to the City ? Given the short notice and the upcoming holidays , we'd appreciate some details.

Thank you

Paul

On Dec 12, 2017, at 1:30 PM, Quinones, Edwin <[quinones.edwin@epa.gov](mailto:quinones.edwin@epa.gov)> wrote:

Hi Paul,

Sorry we missed you this morning. Looks like we got the time zones mixed up. My apologies.

As soon as I get a chance to fully discuss the position paper with HQ, I'll schedule a call to discuss.

As Mike and Ernie and I discussed this morning, EPA OSC Adam Adams is planning a site walk at 10 am December 20. EPA's START Contractor and the PRP Group's Project Coordinator, Eric Pastor, plan to attend. I think it would be highly beneficial for all involved if technical representatives from the City and Severn Trent could also attend. It would provide your clients a better picture from a technical standpoint on the overall concept of the proposed approach, and may help answer some technical questions Mike posed during our call this morning. As I told Mike and Ernie, this is a site walk with technical representatives only. Neither I nor any of the PRP Group attorneys plan to attend.

Please let me know if technical representatives from your respective clients can attend, and I'll let OSC Adams know to expect them. I understand they intend to meet first at 10 am at the USOR property (400 N. Richey St) gate.

Ed Q.

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**From:** [sebyp@gtlaw.com](mailto:sebyp@gtlaw.com) [<mailto:sebyp@gtlaw.com>]

**Sent:** Tuesday, December 12, 2017 12:05 PM

**To:** [mdigiglia@glllaw.com](mailto:mdigiglia@glllaw.com); Quinones, Edwin <[quinones.edwin@epa.gov](mailto:quinones.edwin@epa.gov)>

**Cc:** [bdoherty@glllaw.com](mailto:bdoherty@glllaw.com); [egieger@glllaw.com](mailto:egieger@glllaw.com)

**Subject:** RE: POTW Position Paper- USOR Site

Ed- Mike filled me in on your call.

We look forward to meeting with EPA after we have received your and the agency's feedback on the POTW paper provided to you on Dec. 5<sup>th</sup>. Please let us know when you are prepared to discuss those issues and we can set up a call regarding same.

Thanks

**Paul M. Seby**

Shareholder

Greenberg Traurig, LLP | 1200 17th Street, Suite 2400 | Denver, Colorado 80202

Tel 303.572.6584

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**From:** Mike DiGiglia [<mailto:mdigiglia@glllaw.com>]

**Sent:** Tuesday, December 12, 2017 10:10 AM

**To:** Seby, Paul (Shld-DEN-Env); [quinones.edwin@epa.gov](mailto:quinones.edwin@epa.gov)

**Cc:** Brendan Doherty; Ernie Gieger

**Subject:** RE: POTW Position Paper- USOR Site

Paul,

The call was entered on our calendars for 10 CT so Ernie and I dialed in at 10 am CT and Ed also dialed in at 10 CT. Our mistake.

Ed updated us on the purpose for the walkthrough, our information request and he will send us some possible dates for a meeting in January.

I can give you an update if you give me a call.

Thanks,

Mike

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**From:** [sebyp@gtlaw.com](mailto:sebyp@gtlaw.com) [<mailto:sebyp@gtlaw.com>]

**Sent:** Tuesday, December 12, 2017 11:07 AM

**To:** [quinones.edwin@epa.gov](mailto:quinones.edwin@epa.gov); Mike DiGiglia <[mdigiglia@glllaw.com](mailto:mdigiglia@glllaw.com)>

**Cc:** Brendan Doherty <[bdoherty@glllaw.com](mailto:bdoherty@glllaw.com)>; Ernie Gieger <[egieger@glllaw.com](mailto:egieger@glllaw.com)>

**Subject:** RE: POTW Position Paper- USOR Site

Gents- I dialed in at 10am mtn/ 11am central per our emails below setting the call up.  
Please let me know if you'd like to reschedule.

Paul

**Paul M. Seby**

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Greenberg Traurig, LLP | 1200 17th Street, Suite 2400 | Denver, Colorado 80202

Tel 303.572.6584

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**From:** Quinones, Edwin [<mailto:quinones.edwin@epa.gov>]

**Sent:** Monday, December 11, 2017 11:06 AM

**To:** Mike DiGiglia; Seby, Paul (Shld-DEN-Env)

**Cc:** Brendan Doherty; Ernie Gieger

**Subject:** RE: POTW Position Paper- USOR Site

Sounds good. Thanks for setting up the conference line, Mike.

Ed Q.

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**From:** Mike DiGiglia [<mailto:mdigiglia@glllaw.com>]

**Sent:** Monday, December 11, 2017 11:51 AM

**To:** Quinones, Edwin <[quinones.edwin@epa.gov](mailto:quinones.edwin@epa.gov)>; [sebyp@gtlaw.com](mailto:sebyp@gtlaw.com)

**Cc:** Brendan Doherty <[bdoherty@glllaw.com](mailto:bdoherty@glllaw.com)>; Ernie Gieger <[egieger@glllaw.com](mailto:egieger@glllaw.com)>

**Subject:** RE: POTW Position Paper- USOR Site

Ed and Paul,

We can use my conference call info:

Dial in: 877-633-3112

Passcode: 5046541347

Thanks,

Mike

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**From:** Mike DiGiglia

**Sent:** Monday, December 11, 2017 11:47 AM

**To:** 'Quinones, Edwin' <[quinones.edwin@epa.gov](mailto:quinones.edwin@epa.gov)>; [sebyp@gtlaw.com](mailto:sebyp@gtlaw.com)

**Cc:** Brendan Doherty <[bdoherty@glllaw.com](mailto:bdoherty@glllaw.com)>; Ernie Gieger <[egieger@glllaw.com](mailto:egieger@glllaw.com)>

**Subject:** RE: POTW Position Paper- USOR Site

Ed,

That works for us. Still waiting to hear from Paul.

Thanks,

Mike

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**From:** Quinones, Edwin [<mailto:quinones.edwin@epa.gov>]

**Sent:** Monday, December 11, 2017 9:28 AM

**To:** [sebyp@gtlaw.com](mailto:sebyp@gtlaw.com)

**Cc:** Mike DiGiglia <[mdigiglia@glllaw.com](mailto:mdigiglia@glllaw.com)>; Brendan Doherty <[bdoherty@glllaw.com](mailto:bdoherty@glllaw.com)>

**Subject:** RE: POTW Position Paper- USOR Site

Hi Paul,  
Would tomorrow (Tuesday, Dec. 12) at 11 am Central (10 am Mountain) work for you and Mike?  
Ed

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**From:** [sebyp@gtlaw.com](mailto:sebyp@gtlaw.com) [<mailto:sebyp@gtlaw.com>]

**Sent:** Friday, December 08, 2017 10:40 AM

**To:** Quinones, Edwin <[quinones.edwin@epa.gov](mailto:quinones.edwin@epa.gov)>

**Cc:** [mdigiglia@glllaw.com](mailto:mdigiglia@glllaw.com); [bdoherty@glllaw.com](mailto:bdoherty@glllaw.com)

**Subject:** Re: POTW Position Paper- USOR Site

Ed , thanks for acknowledging the call and we appreciate EPA's attention to the position paper and look forward to discussing soon. We would still like to speak with you on other matters on Tuesday , if doing so some time works for you .

Please let us know

Thanks

On Dec 8, 2017, at 8:28 AM, Quinones, Edwin <[quinones.edwin@epa.gov](mailto:quinones.edwin@epa.gov)> wrote:

Hi Paul,

Sorry I missed your call yesterday. I got your voice-mail message asking for a conference call next week to discuss the points you've made in your position paper. Although I've done my own research on the issue, I have not yet had a chance to discuss the matter with HQ and Department of Justice attorneys. I'd like the opportunity to do so before we can have a meaningful discussion. I'm hoping to be able to do so by the end of next week at the earliest or the week after (week of December 18).

Also, I appreciate you letting me know the week of December 18 will not work for a meeting with the EPA and the PRP Group. However, would a technical representative from the City and Severn Trent be available to meet the EPA On-Scene Coordinator, Adam Adams, and the PRP Group's Project Coordinator for a site walk on Wednesday, December 20, of the former wastewater treatment plant? Having them available would be invaluable given their much greater familiarity of the property. The site walk would be with technical representatives only. Neither I nor any of the PRP attorneys will be at the site walk. Please let me know if a representative from one or both would be available for this.

Thanks,

Ed Q.

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**From:** [sebyp@gtlaw.com](mailto:sebyp@gtlaw.com) [<mailto:sebyp@gtlaw.com>]

**Sent:** Tuesday, December 05, 2017 11:50 AM

**To:** Quinones, Edwin <[quinones.edwin@epa.gov](mailto:quinones.edwin@epa.gov)>

**Cc:** [mdigiglia@glllaw.com](mailto:mdigiglia@glllaw.com); [bdoherty@glllaw.com](mailto:bdoherty@glllaw.com)

**Subject:** POTW Position Paper- USOR Site

Greetings Ed-

Following up on our conversation, attached is the position paper we discussed.

The City of Pasadena and Severn Trent Environmental Services would appreciate EPA's prompt review and consideration of these issues. After you have had an opportunity to review and consider the attached, please let us know if we can arrange a time to visit- on both the paper and the points in your email yesterday.

Thanks

**Paul M. Seby**

Shareholder

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